

EXHIBIT S

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION

UNITED STATES OF AMERICA, ex rel.)
DILBAGH SINGH, M.D., PAUL KIRSCH,)
M.D., V. RAO NADELLA, M.D., and)
MARTIN JACOBS, M.D.,)

Relators,)

vs.)

Civil Action
No. 04-186E

BRADFORD REGIONAL MEDICAL CENTER,)
V&S MEDICAL ASSOCIATES, LLC,)
PETER VACCARO, M.D., KAMRAN SALEH,)
M.D., and DOES I through XX,)

Defendants.)

DEPOSITION OF JAMES H. JORDON

WEDNESDAY, JULY 2, 2008

Deposition of JAMES H. JORDON, called as a
witness by the Relators, taken pursuant to Notice of
Deposition and the Federal Rules of Civil Procedure,
by and before Joy A. Hartman, a Court Reporter and
Notary Public in and for the Commonwealth of
Pennsylvania, at the offices of Horthy Springer, 4614
Fifth Avenue, First Floor, Pittsburgh, Pennsylvania,
commencing at 9:05 a.m. on the day and date above set
forth.

1 failed, along with the auditors, the lawyers, all the
2 other parties that were involved with this particular
3 institution.

4 Q. Who was the plaintiff?

5 A. The plaintiff were the investors.

6 Q. Where was this filed?

7 A. It was filed in Texas.

8 Q. In the --

9 A. Houston.

10 Q. -- Federal Court?

11 A. I don't believe so.

12 Q. State court. And that has been the only time
13 you have been deposed?

14 A. Yes.

15 MR. SIMPSON: To start with, I would like
16 to mark as Exhibit 1 a copy of your expert
17 report, which you don't need a copy of.

18 (Jordon Deposition Exhibit No. 1 was
19 marked for identification.)

20 A. To close the loop on that question, though, the
21 case did go to trial, and the case was dismissed
22 before it went to a jury, and it is on appeal. That
23 is where it stands.

1 Q. But you as an individual, did you say you were
2 dismissed before trial?

3 A. Yes.

4 Q. I'm going to show you Exhibit 1 and ask you to
5 look at that, and tell me, is that a copy of the
6 expert report that you rendered in this case?

7 A. Based on page one, yes, but if I could flip it
8 just to --

9 Q. Feel free. I will tell you that is actually
10 the actual copy I got in the mail, not even a
11 photocopy of it or anything.

12 A. This is a copy of my expert report.

13 Q. You can keep that. We will be probably
14 referring to it a good bit.

15 MR. SIMPSON: I would like to go ahead and
16 mark as Exhibit 2 a document that was just
17 given to us this morning if I could.

18 (Jordon Deposition Exhibit No. 2 was
19 marked for identification.)

20 Q. I am showing you Exhibit 2, which is a document
21 entitled Bradford Time Summary. Can you tell me what
22 this is?

23 A. My understanding was disclosure is required as

C E R T I F I C A T E

COMMONWEALTH OF PENNSYLVANIA :
: SS.:
COUNTY OF ALLEGHENY :

I, Joy A. Hartman, a Notary Public in and for the Commonwealth of Pennsylvania, do hereby certify that before me personally appeared JAMES H. JORDON, the witness herein, who then was by me first duly cautioned and sworn to testify the truth, the whole truth and nothing but the truth in the taking of his oral deposition in the cause aforesaid; that the testimony then given by him as above set forth was reduced to stenotypy by me, in the presence of said witness, and afterwards transcribed by computer-aided transcription under my direction.

I do further certify that this deposition was taken at the time and place specified in the foregoing caption, and signature was not waived.

I do further certify that I am not a relative of or counsel or attorney for any party hereto, nor am I otherwise interested in the event of this action.

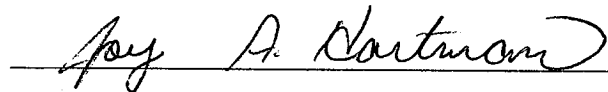
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Pittsburgh, Pennsylvania, on this 9th day of July, 2008.

The foregoing certification does not apply to any reproduction of this transcript in any respect unless under the direct control and/or direction of the certifying reporter.

Commonwealth of Pennsylvania

NOTARIAL SEAL

JOY A. HARTMAN, Notary Public
City of Pittsburgh, County of Allegheny
My Commission Expires May 9, 2010



Joy A. Hartman, Notary Public
in and for the Commonwealth of
Pennsylvania

My commission expires May 9, 2010.